TUVOIÞÁÕÜŒÞVÒÖ Kein H. Shorp

## UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

NATASHA HOLLAND,	)
Plaintiff,	) Case No. 3:13cv1198
v.	) Judge Sharp
THE METROPOLITAN	) Magistrate Judge Bryant )
GOVERNMENT OF NASHVILLE	)
AND DAVIDSON COUNTY,	)
et al.	)
Defendants.	)

## <u>DEFENDANT POLICE CHIEF STEVE ANDERSON'S MOTION TO STAY</u> <u>DISCOVERY</u>

Defendant Police Chief Steve Anderson respectfully moves to stay discovery as to him individually while the Court considers his contemporaneously-filed motion to dismiss, which is based, in part, on qualified immunity. Because the qualified-immunity defense is immunity from *suit*, and given the legally-deficient nature of Plaintiff's claims in this case (as outlined in Defendant's motions to dismiss), judicial economy weighs in favor of staying discovery pending resolution of the motion to dismiss.

At around midnight on January 11, 2013, Metropolitan Nashville Police Department ("MNPD") Officer Phillip Shuler pulled Plaintiff over. Officer Shuler asked Plaintiff to step out of her car and perform some sobriety tests. According to Plaintiff, Officer Shuler nearly stepped into traffic while conducting these tests. When Plaintiff expressed her concern to Officer Shuler, he ordered her into his patrol car to perform a breathalyzer test. Plaintiff requested a blood test. At that point, Plaintiff alleges that Officer Shuler flung the patrol car door open, grabbed Plaintiff by her arm, told her that she was under arrest, and roughly pulled Plaintiff from the car.